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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LARIME TAYLOR, an individual,
Plaintiff,

VS.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, in its official capacity; CLARK COUNTY, a political subdivision
of the State of Nevada; SHERIFF JOSEPH LOMBARDO, in his official capacity as
Sheriff of the Las Vegas Metropolitan Police
Department; OFFICER YOUNG, as an
individual and in his capacity as a Las Vegas
Metropolitan Police Department Officer;
OFFICER KRAVITZ, as an individual and
in his capacity as a Las Vegas Metropolitan
Police Department Officer; OFFICER
DARRELL LEE DAVIES, as an individual
and in his official capacity as a Las Vegas
Metropolitan Police Department Officer;
OFFICER WESTON FERGUSON, as an
individual and in his official capacity as a
Las Vegas Metropolitan Police Department
Officer; OFFICER THOMAS ALBRIGHT,
as an individual and in his official capacity
as a Las Vegas Metropolitan Police
Department; OFFICER JANETTE
GUTIERREZ, as an individual and in her
official capacity as a Las Vegas Metropolitan
Police Department Officer; OFFICER
CLINT OWENSBY, as an individual and in
his official capacity as a Las Vegas

Case No.: 2:19-cv-00995-JCM-NJK

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR
PLAINTIFF'S RESPONSE TO
COUNTY DEFENDANTS'
MOTION TO STAY DISCOVERY
(ECF No. 38)**

(FIRST REQUEST)

1 Metropolitan Police Department; OFFICER
2 ROBERT THORNE, as an individual and in
3 his official capacity as a Las Vegas
4 Metropolitan Police Department Officer;
5 OFFICER JACOB BITTNER, as an
6 individual and in his official capacity as a
7 Las Vegas Metropolitan Police Department
8 Officer; OFFICER GERARDO REYES, as
9 an individual and in his official capacity as a
10 Las Vegas Metropolitan Police Department
11 Officer; OFFICER MORGAN MCCLARY,
12 as an individual and in his official capacity
13 as a Las Vegas Metropolitan Police
14 Department Officer; OFFICER JAKE
15 FREEMAN, as an individual and in his
16 official capacity as a Las Vegas Metropolitan
17 Police Department Officer; and OFFICER
18 CHRISTOPHER LONGI, as an individual
19 and in his official capacity as a Las Vegas
20 Metropolitan Police Department Officer,
21 Defendants.

22 Pursuant to LR IA 6-1, Plaintiff LARIME TAYLOR and Defendants CLARK
23 COUNTY and CLARK COUNTY DEPARTMENT OF PUBLIC WORKS (“County
24 Defendants”), by and through their respective counsel, hereby stipulate and request that this
25 Court extend the deadline to file the Plaintiff’s Response to County Defendants’ Motion to
26 Stay Discovery (ECF No. 38) filed on September 17, 2019 by an additional six (6) days,
27 extending the deadline from October 1, 2019 to October 7, 2019. This is the first stipulation
28 for extension of time for Plaintiff to file his Response.

21 This Request for an extension of time is not sought for any improper purpose or
22 other purpose of delay. This request for extension is based upon the following:

23 Counsel for Plaintiff initiated this request because counsel is currently discussing
24 with counsel for the County Defendants possible resolutions to discovery matters. This
25 extension is therefore necessary to allow the parties to continue discussions and avoid
26 unnecessary filings with this Court.

27 WHEREFORE, the parties respectfully request that this Court extend the deadline
28 to file Plaintiff’s Response to County Defendants’ Motion to Stay Discovery (ECF No. 38)

1 filed on September 17, 2019 to up to and including October 7, 2019.

2 IT IS SO STIPULATED.

3 DATED this the 1st day of October, 2019.

4 **MCLEITCHIE LAW**

5 /s/ Alina M. Shell

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9 *Attorneys for Plaintiff Larime Taylor*

DATED this the 1st day of October, 2019.

DISTRICT ATTORNEY'S OFFICE

/s/ Joel K. Browning

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*Attorneys for Clark County and Clark County
Department of Public Works*

12 **ORDER**

13 IT IS SO ORDERED.

16 
17 NANCY J. KOPPE
U.S. MAGISTRATE JUDGE

19 DATED: October 3, 2019